

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 04-00245-04-CR-W-FJG

RODERICK N. CRISS,

Defendant,

HENKEL CORPORATION,

Garnishee.

**MOTION FOR ORDER DIRECTING GARNISHEE TO PAY OVER FUNDS**

The United States of America moves the Court for an Order directing the garnishee, Henkel Corporation, to withhold and pay over funds held pursuant to the Writ of Garnishment issued by the Court. In support of this motion plaintiff states as follows:

1. The United States filed an Application for Writ of Garnishment on January 24, 2019, and the Clerk of the United States District Court thereafter issues a Writ of Garnishment (“Writ”) against the defendant Roderick Criss.
2. Defendant and garnishee were served by mail with the Writ on January 24, 2019, as evidenced by the Certificate of Service filed herein.
3. Pursuant to the Writ, garnishee filed an Answer on June 6, 2019, stating that at the time of service of the Writ it had in its possession or under its

control wages belonging to and due the defendant in the amount of \$597.59, and that garnishee would continue to withhold 25 percent of defendant's net wages.

4. The defendant has been notified of his right to a hearing and has not requested a hearing to determine exempt property, nor has defendant filed written objections to garnishee's Answer.

WHEREFORE, The United States requests that the Court issue an Order directing garnishee to pay over to the United States District Court Clerk the funds currently being held pursuant to the Writ of Continuing Garnishment, and to continue withholding 25 percent of defendant's net wages.

Respectfully submitted,

Timothy A. Garrison  
United States Attorney

By

**/s/ Stacey Perkins Rock**

Stacey Perkins Rock  
Missouri Bar No. 66141  
Assistant United States Attorney  
Charles Evans Whittaker Courthouse  
400 E. 9th Street, Room 5510  
Kansas City, Missouri 64106  
Telephone: (816) 426-7166

**CERTIFICATE OF SERVICE**

I hereby certify that on this 15th day of July 2019, a true and correct copy of the foregoing document was filed with the Court using the Court's CM/ECF system and was served upon on the following non-ECF participant via U.S. Mail, redacted herein pursuant to Fed.R.Crim.P. 49.1(a)(5), upon the following:

Henkel Missouri Remote  
Attn: Payroll Department  
1737 Horseshoe Ridge Road  
Chesterfield, MO 63005  
Garnishee

Roderick Criss  
xxxxxxxxxx  
Kansas City, MO

**/s/Stacey Perkins Rock**

Stacey Perkins Rock  
Assistant United States Attorney